UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: LORI J. BLISS : CHAPTER 13

Debtor(s)

:

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

Movant

:

VS.

:

LORI J. BLISS

Respondent(s) : CASE NO. 5-17-bk-04027

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 12th day of April, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
 - a. Proof of Claim for Credit Union.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

(717) 300-009

BY: /s/Agatha R. McHale

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 12th day of April, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Lisa M. Doran, Esquire 69 Public Square, Suite 700 Wilkes Barre, PA 18701

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee